Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

In the Matter of	)	GEN Docket No. 90-314
	)	ET Docket No. 92-100
	)	
Amendment of the Commission's	)	RM-7140, RM-7175, RM-7617,
Rules to Establish New	)	RM-7618, RM-7760, RM-7782,
Personal Communications	)	RM-7860, RM-7977, Rm-7978,
Services	)	RM-7979, Rm-7980
	)	
	)	PP-35 through PP-40, PP-79
	)	through PP-85

REPLY COMMENTS OF THE UNITED STATES TELEPHONE ASSOCIATION

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SUMMARY

The majority of commenters agreed with USTA that exchange carriers should be full and equal providers of PCS. The majority of commenting parties also favor the use of MSAs and RSAs as the initial PCS serving areas, the grant of five licenses of 20 MHz in each serving area and the provision of PCS as a common carrier service. Thus, the record developed to date will not support prohibiting exchange carrier provision of PCS. To the contrary, full exchange carrier eligibility will be a major factor in advancing the goals of rapid and widespread deployment of PCS.

USTA refutes those commenting parties who suggest that exchange carriers should be restricted in their provision of PCS. Such restrictions will not further the Commission's goals and are unnecessary. Full and equal exchange carrier participation will facilitate opportunities for the expeditious development of crative and adaptive PCS offerings, thus stimulating demand for these services and enhancing technological developments in the public switched telephone network to the benefit of both customers and providers.

USTA reiterates that the use of MSAs and RSAs as the serving areas for PCS will permit a greater number of service providers, enhance service and product innovation and broaden the availability of PCS. It will also foster speedy deployment and will provide an opportunity to bring PCS to less affluent and less populated areas. In order to encourage early deployment of

PCS in non-metropolitan areas, USTA has proposed that the Commission reserve one block of spectrum in each RSA for exchange carriers to provide PCS in their exchange serving areas. This will enable smaller telephone companies to meet competition and to participate in the PCS market.

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REPLY COMMENTS
OF THE
UNITED STATES TELEPHONE ASSOCIATION

The United States Telephone Association (USTA) respectfully submits its reply to the comments filed in the above-referenced proceeding on November 9, 1992.

In its comments, USTA provided the Federal Communications Commission (Commission) with a definition of personal communications services (PCS) which would permit recognition of PCS as distinct, competitive offerings which use microcell, low-power technology to deploy high-capacity systems designed primarily for pedestrian and in-building applications. USTA also provided support for exchange carrier eligibility to be full and equal providers of PCS in their serving areas. Cellular holdings should not affect an exchange carrier's ability to obtain a PCS license in its serving area. USTA explained that the use of Metropolitan Statistical Areas (MSAs) and Rural Service Areas (RSAs) to establish the initial serving areas for PCS would

enable the Commission to meet its stated objectives. One block of spectrum within each RSA should be reserved for exchange carriers to provide PCS to their customers to ensure that non-metropolitan customers have access to PCS. Five licensed, paired channel sets of 20 MHz for PCS in each serving area, one unlicensed, paired channel set of 20 MHz for narrowband applications and 20 MHz of unlicensed spectrum for wideband applications should be allocated to PCS. To identify licensees, USTA believes that, while a comparative hearing is more likely to yield a truly qualified applicant, a modified, "post card" type lottery can be utilized. USTA agrees with the Commission that non-discriminatory interconnection of PCS to the public switched telephone network, consistent with existing rules, is in the public interest. However, all providers of PCS should be regulated in an equivalent manner to avoid conferring a competitive advantage on certain providers. PCS should be provided as a common carrier service. A common air interface standard is necessary to enhance the value of PCS and to facilitate its rapid deployment. The Commission should encourage the established industry bodies to develop the necessary standards as soon as possible. In order to reduce potential interference, the Commission should establish PCS as a low power service and require that to be type-accepted, PCS equipment demonstrate the ability to avoid interference.

Despite the overwhelming number of different commenters in this proceeding, the majority agreed with the points made by USTA. For example, most commenting parties support exchange carrier eligibility to provide PCS. The majority of commenting parties also favor the use of MSAs and RSAs as the initial PCS serving areas, the grant of five licenses of 20 MHz in each serving area, and the provision of PCS as a common carrier service. USTA will refute dissenting views expressed regarding exchange carrier eligibility and the initial serving area size in its reply comments.

I. THE RECORD SUPPORTS EXCHANGE CARRIER ELIGIBILITY TO PROVIDE PCS WITHIN THE EXCHANGE CARRIER SERVING AREA.

A. A Wide Range of Commenters Representing Diverse Interests Support Exchange Carrier Provision of PCS.

USTA described the unique PCS capabilities and service opportunities for customers which would result if exchange carriers are eligible to provide PCS in their serving areas.[1] By utilizing the resources and expertise of exchange carriers, the Commission can facilitate the rapid availability and economical deployment of PCS, enhance the value of the public switched telephone network and provide benefits to exchange carrier customers. Exchange carrier provision of PCS will meet the Commission's goals in this proceeding to foster universality, speed of deployment, diversity of services and competitive delivery. A number of commenting parties representing diverse

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[1] USTA comments at pp. 8-15.

interests agree that exchange carrier participation would be in the public interest and would benefit other providers and customers as well.

For example, the following commenting parties support exchange carrier participation in PCS: Northern Telecom[2] ("cellular companies and LECs can increase competition in the wireless services market, and provide PCS services in a cost effective manner."), Interdigital[3] ("To restrict them [cellular entities] and the LECs' ownership is shortsighted."), Hughes Network Systems (HNS)[4] ("HNS favors a regulatory approach that will promote broad participation and create market opportunities for a wide range of companies, while not foreclosing entities with a proven record of interest, experience and accomplishment."), Century Cellnet, Inc. (Century)[5] ("In Century's view, there should be no prohibition on the LECs obtaining PCS licenses. The LECs could use the PCS licenses for the provision of a variety of services, including wireless local loop service."), Florida Cellular RSA Limited Partnership[6] ("There should be no limitation on the ability of existing cellular licensees or LECs to participate for PCS

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[2] Northern Telecom at p. 28.

[3] Interdigital at p. 12.

[4] HNS at p. 7.

[5] Century at p. 8.

[6] Florida Cellular RSA Limited Partnership at pp. 9-11.

authorizations."), Telmarc Telecommunications[7] ("It is recommended that the Commission allow the LECS to have access to PCS frequencies on a basis that is equal to any other bidder."), Chief Counsel for Advocacy of the United States Small Business Administration[8] ("the LEC may be the only party interested in providing the infrastructure, such as microcells, needed for PCS in rural areas."), Telocator[9] ("Policies preferring or excluding qualified applicants disserve the public interest by limiting both diversity and competition."), Fleet Call[10] ("Fleet Call believes that it is not necessary to adopt eligibility restrictions at this time on LECs."), New York Department of Public Service (NYDPS)[11] ("LECs and cellular carriers should not be precluded from providing PCS within their existing service areas."), and the Federal Communications Commission Office of Plans and Policy (OPP)[12] ("Because of the economies of scope which could be achieved, the study finds that consumers could benefit from allowing cellular and local telephone companies to

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[7] Telmarc Telecommunications at p. 34.

[8] Chief Counsel for Advocacy of the United States Small Business Administration at p. 22.

[9] Telocator at p. 6.

[10] Fleet Call at footnote 27.

[11] NYDPS at p. 8.

[12] D. Reed, Putting it All Together: The Cost Structure of Personal Communications Services, Working Paper No. 28, Office of Plans and Policy, Federal Communications Commission, November 1992, at p. v. (OPP paper).

hold at least some PCS spectrum if a sufficient number of PCS competitors exist.")

The record developed to date will not support prohibiting exchange carrier provision of PCS. To the contrary, full exchange carrier eligibility will be a major factor in advancing the goals of rapid and widespread deployment of PCS.

B. Restrictions on Exchange Carrier Participation in PCS Will Not Further the Commission's Goals and Are Unnecessary.

Restrictions on exchange carrier participation in PCS would handicap experienced and capable competitors in the market and may preclude PCS availability in areas where competition is less likely to develop.[13] Exchange carrier participation will facilitate opportunities for the expeditious development of creative and adaptive PCS offerings, thus stimulating demand for these services and enhancing technological developments in the public switched telephone network. It is far too early in the developmental stages of PCS to conclude that these potential providers must be either prohibited or restricted from participating in the PCS market. Limiting exchange carriers' "participation in PCS would tie the hands of an important set of firms that, by virtue of their experience providing service in local areas and their broad participation in the telecommunications industry in general, could apply valuable

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[13] Bell Atlantic at pp. 4-14.

knowledge and insight to the devlopment of PCS that otherwise would go untapped. The development of locally-oriented services in particular could benefit from LEC participation."[14] It is in the early stages of development and deployment that all potential providers should be allowed to fully participate in establishing PCS.

1. An Exchange Carrier's Cellular Holdings Should Not Affect its Eligibility to Obtain a PCS License in its Serving Area.

Some commenting parties claim that exchange carrier participation in the provision of PCS should be predicated upon the absence of any cellular holdings by the exchange carrier or its affiliates.[15] Such a restriction is unnecessary and would only serve to prevent many small telephone companies from providing PCS to their customers.[16]

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[14] Comments of Telephone and Data Systems at Attachment, p.42.

[15] Public Utilities Commission of the State of California at p. 2, National Telecommunications and Information Administration at pp. 29-32, Pass Word, Inc. at p. 6, PDM/PCS at p. 4, Pertel at p. 10, and Swayzee Telephone Company at pp. 2-3.

[16] See, Comments of Chesnee Telephone Company at p. 1; Harrisonville Telephone Company at p. 9; Home Telephone Company at p. 6; Kerrville Telephone Company at pp. 1-2; Palmetto Rural Telephone Cooperative at p. 8; Piedmont Rural Telephone Cooperative at p. 2; Rock Hill Telephone Company at p. 11; and Taconic Telephone Company at p. 4.

Most exchange carriers do not directly provide or have a controlling interest in a cellular operation. While some exchange carriers may hold minority limited partnership interests, such interests do not permit exchange carriers to participate in the management of the cellular operation. Further, in many cases where an exchange carrier may hold a minority limited partnership interest, the cellular operation does not provide service in the exchange carrier's wireline serving area. Therefore, most exchange carriers do not have preferential access to cellular spectrum to offer wireless services to their customers. Existing structural separation requirements also prevent certain exchange carriers from having any access to an affiliate's spectrum.

Further, the capacity, economic constraints and embedded network architecture currently used in the provision of cellular service, will not permit, within the spectrum allocated for cellular, the wide range of services and price points necessary for the provision of PCS.[17] The OPP recognizes that cellular and PCS are likely to develop as two separate networks, one offering high-speed mobile services using large cells and high-power handsets analogous to today's cellular telephone networks, and one that delivers low-speed pedestrian services using

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[17] USTA at pp. 17-19; Pacific Telesis at p. 17; Cincinnati Bell at p. 2.

microcells and low-power handsets.[18] Current cellular allocations will not be able to support PCS without compromising the capabilities and potential of both services. While the services may be competitive and, as is more likely, complementary, they are distinct. Potential providers should be permitted to make business decisions as to which services they will seek to offer.

2. Exchange Carriers Should Be Permitted to Provide PCS Within Their Wireline Serving Areas.

Other commenting parties suggest that exchange carriers only be permitted to provide PCS outside their wireline serving areas.[19] Such a restriction would effectively negate most of the benefits of exchange carrier participation in PCS and could adversely impact exchange carrier customers. It would also be contrary to the Commission's intention to let the market, not regulation, determine how and when technology is deployed and what services are offered to the public.[20] USTA urges the Commission not to adopt such a restriction, as provision of PCS by an exchange carrier within its wireline service area is

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[18] OPP paper at p. 65.

[19] CalCell Wireless, Inc. at pp. 18-19, Celsat, Inc. at p. 19, Comcast PCS Communications, Inc. at p. 12, PCN America, Inc. at p. 6, PDM/PCS at p. 4, Personal Communications Network Services of New York, Inc. at pp. 21-23, Teleport Denver Ltd. at pp. 4-5, Tel/Logic, Inc. at pp. 9-10, Vanguard Cellular Systems, Inc. at pp. 13-15, Viacom International, Inc. at p. 18, Tandy at pp. 6-7 and Pinon Communications, Inc. at p. 2.

[20] Alltel at pp. 10-11.

exactly where the benefits of scope of services would be the greatest and would result in the greatest benefit to customers.

First, such a restriction would harm small and mid-sized exchange carriers since they do not generally have the resources and capabilities to provide service outside their wireline service areas.

Second, permitting exchange carriers to provide PCS only outside their wireline serving areas will prevent them from using their existing infrastructures to deliver these new services. This will prevent exchange carriers from employing the economies of scope which would enable them to reduce the initial costs of deployment.[21] The OPP paper found considerable economies of scope between PCS and the telephone network which would result in savings for customers as compared to stand-alone systems.[22] Its analysis shows that substantial benefits could be realized by allowing telephone companies to offer PCS on an integrated basis with telephone service.[23] Development and maintenance of a PCS support infrastructure requires a long-term commitment and considerable expense. Therefore, use of exchange carrier

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[21] USTA at pp. 9-11.

[22] OPP paper at pp. 29-32, 43.

[23] Id. at p. 56.

networks will be important to the economical and rapid deployment of PCS.[24]

Third, such a restriction will prevent exchange carriers from increasing utilization of the exchange carrier network infrastructure, thus preventing increases in the efficiency and utility of those networks. Exchange carrier backbone networks must be permitted to evolve in order to take full advantage of advances in technology. This evolution benefits all telecommunications customers and providers.

Integrating PCS with the local exchange networks properly recognizes that PCS is an example of the natural evolution of local exchange service. It would permit PCS customers to take advantage of the existing and emerging intelligent network services, thereby fostering the deployment and enhancement of PCS. The ability of exchange carriers to provide PCS within their wireline service areas would create additional incentives for them to upgrade their networks to support PCS. Such upgrades would be available to their competitors as well.[25]

Fourth, restricting exchange carrier provision of PCS to outside the exchange carrier's serving area would not be in the best interest of exchange carriers' customers. Such customers

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[24] Cincinnati Bell at p. 5.

[25] USTA at p. 34.

would be prevented from receiving service from their carrier of choice. Companies with a direct and immediate interest in providing quality telecommunications service throughout the communities in their serving areas would be unable to continue to do so.[26] These customers would be forced to pay more for PCS, at least initially, if the provider chooses to build a stand-alone system. Exchange carriers would also be prevented from using new wireless technologies to expand service offerings to potential customers in their wireline serving areas.[27] This restriction would also prevent exchange carriers from offering PCS to customers located in non-metropolitan areas of their serving areas.[28]

Sufficient safeguards are in place to assuage any remaining speculation regarding anti-competitive concerns. Such speculation has accompanied exchange carrier entry into cellular, as well as other new services, and has proven to be unfounded.[29]

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[26] BellSouth at pp. 49-55.

[27] Exchange carriers have a unique role in developing mass markets for PCS, especially among small business and residential customers. (NYNEX at Appendix A.)

[28] Clear Creek Mutual Telephone Company at p. 2; Concord Telephone Company at p. 2; Harrisonville Telephone Company at pp. 1-2; Roseville Telephone Company at p. 5; and Small Rural Virginia Telephone Companies at p. 1.

[29] OPP speculates that exchange carriers may try to disadvantage competitors with inferior interconnection (at p. 59). This did not occur in the provision of cellular and there is no reason to suspect it would occur in the provision of PCS. In addition, the

Since there is no evidence of exchange carrier actions to limit competition, there is no basis upon which to limit their participation.[30] Current nonstructural safeguards and nondiscriminatory interconnection are sufficient to relieve concerns regarding exchange carrier provision of PCS in its serving area.

3. Exchange Carriers Should Not Be Limited to 10 MHz of Spectrum for the Provision of PCS.

Several commenting parties expressed support for the Commission's suggestion that exchange carriers only receive 10 MHz of spectrum for the provision of PCS.[31] There is no basis for such a restriction. Competitive concerns do not justify such a restriction, since any such concerns can be dealt with through current regulatory safeguards. It is certainly not in the public interest to restrict exchange carrier access to spectrum which could be utilized to make PCS available to exchange carrier customers in favor of providing additional spectrum to private, non-commercial users as UTC proposes.

Commission's actions in CC Docket No. 91-141 further limit any potential ability to cross subsidize access and transport services and will open the local loop to even more competition. (Citizens Utility at p. 5).

30 Southwestern Bell at pp. 17-18.

31 Utilities Telecommunications Council (UTC) at p. 34; Advanced Cordless Technologies at p.7.

As noted above, this restriction only serves to limit exchange carriers' ability to serve their customers, thus, ultimately, the adverse impact falls on the customer. As HNS observes, "the potential benefits from wireless loop applications favor allowing LECs to become PCS licensees eligible for a full [30 MHz] license, instead of the more limited 10".[32]

10 MHz is not sufficient to provide the full-feature PCS described by USTA in its comments. The OPP paper agrees, concluding that a spectrum allocation size of at least 20 MHz would be a reasonable lower bound for any PCS provider.[33] USTA has also recommended allocations of 20 MHz for each PCS licensee.[34] No commenting party has provided evidence that 10 MHz is sufficient and a frequency plan that includes a 10 MHz allocation has not been proposed. Thus, there is no basis for the Commission to adopt such a proposal.

Further, exchange carriers should not be limited to the provision of PCS in unlicensed spectrum.[35] Again, such a restriction would not enable exchange carriers to provide the PCS as described in USTA's comments. Exchange carriers should be

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[32] HNS at p. 8.

[33] OPP at p. 53.

[34] USTA at pp. 30-31.

[35] Pass Word, Inc. at p. 7.

permitted to be full and equal participants in the provision of PCS and should be eligible for a 20 Mhz license.

II. THE USE OF MSAs AND RSAs AS PCS SERVING AREAS WILL MEET THE COMMISSION'S GOALS.

As USTA explained in its comments, the use of MSAs and RSAs as the serving area for PCS will meet the Commission's goals in this proceeding.[36] The use of smaller serving areas will permit a greater number of service providers, enhance service and product innovation and broaden the availability of PCS. It will also foster speed of deployment and may bring PCS more quickly to both less affluent and less populated areas.

MSAs and RSAs have been utilized successfully for a number of years. There is no reason to introduce yet another market area definition for the provision of PCS, particularly at the initial stage. The majority of commenting parties supports the

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[36] USTA at pp. 19-22. See, also, Cincinnati Bell at pp. 15-16.

use of MSAs and RSAs.[37] USTA urges the Commission to reject the larger service areas suggested by some commenting parties.[38]

The use of MSAs and RSAs also allows the Commission to better ensure that PCS reaches customers in non-metropolitan areas. In order to encourage early deployment of PCS in non-metropolitan areas, USTA proposed that the Commission reserve one block of spectrum in each RSA for exchange carriers to provide

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[37] Bell South at pp. 30-39; Cincinnati Bell at pp. 15-16; NYNEX at pp. 23-24; Southern New England Telecommunications Corporation at p. 7; Southwestern Bell at pp. 20-24; Cellular Telecommunications Industry Association at pp. 36-40, 58-59; Century at pp. 10-11; McCaw at pp. 14-18; Rural Cellular Corporation at p. 2; Vanguard Cellular at pp. 10-11; Alltel at p. 12; Centel at p. 12; GTE at p. 32; Home Telephone at p. 1; Lincoln at p. 11; Palmetto at p. 2; Rochester at p. 4; Rock Hill at p. 5; Roseville at p. 12; Taconic at p. 2; TDS at p. 8; HNS at p. 6; Fleet Call at p. 5; Department of Justice at p. 23; NYDPS at pp. 7-8; Pennsylvania PUC at p. 7; Adelphia Communication Corporation at p. 5; American Mobile Telecommunications Association, Inc. at pp. 7-9; Cellular Service, Inc. at pp. 2-3; Chesnee Telephone Company at p. 1; Concord Telephone Company at pp. 3-4; Florida Cellular RSA Limited Partnership at p. 8; National Rural Telecom Association and OPASTCO at pp. 9-13; National Telephone Cooperative Association at p. 3; Pass Word, Inc. at p. 4; PDM/PCS at p. 5; Piedmont Rural Telephone Cooperative, Inc., at p. 2; Point Communications Company at p. 2; Rural Cellular Coalition at pp. 13-18; Small Rural Virginia Telephone Companies at p. 2; South Carolina Telephone Association at pp. 4-5; Sprint Corporation at pp. 4-5; Viacom Interntional at p. 17 and Ohio LINX at p. 5.

[38] National Telecommunications and Information Administration at pp. 11-20; Pertel, Inc. at pp. 7-8; Pinon Communications, Inc. at p.1; Small Business PCS Association at pp. 3-5; Teleport Denver Ltd. at pp. 7-8; Public Service Commission of Wisconsin at pp. 12-13.

PCS in their exchange serving areas.[39] Such a proposal would not hinder competition as there could be as many as four other providers in the market. However, it would give the Commission the opportunity to ensure that customers in non-metropolitan areas do not lag behind other customers in receiving new services. It will also enable small telephone companies to meet competition and to participate in the PCS market.

While other parties suggest similar proposals[40], none suggest a limited reserve aimed at bringing PCS to areas where PCS may not even be offered unless exchange carriers are allowed to do so. Further, the other proposals will not advance the Commission's goals in this proceeding. Reserving one allocation for exchange carriers in a RSA will facilitate the universality of PCS by encouraging its deployment in non-metropolitan areas. It will also foster speedy deployment of PCS in non-metropolitan areas, since exchange carriers want the opportunity to provide these services to their customers. It permits the competitive delivery of service since four other licenses will be available. Finally, USTA's proposal will provide smaller carriers the opportunity to provide new services to their customers, thus allowing customers in non-metropolitan areas access to the diversity of services available to their urban neighbors.

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[39] USTA at pp. 22-27.

[40] Cable Vision Systems at pp. 13-14.

III. CONCLUSION.

The record developed in this proceeding shows that exchange carrier provision of PCS in their exchange serving areas is in the public interest. The Commission should adopt an Order which allows exchange carriers to be full and equal participants in the provision of PCS.

Respectfully submitted,

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January 8, 1993

CERTIFICATE OF SERVICE

I, Linda Kent, do certify that on December 8, 1993 copies of the foregoing Reply Comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.

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